

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JACQUES RIVERA,)	
)	No. 12 CV 004428
Plaintiff,)	
)	
v.)	The Honorable Joan B. Gottschall
)	
REYNALDO GUEVARA, et al.,)	
)	
Defendants.)	

**CITY DEFENDANTS’ OBJECTION TO PLAINTIFF’S MOTION FOR LEAVE TO
FILE EXCESS PAGES**

Defendants Reynaldo Guevara, Steve Gawrys, Edward Mingey, and City of Chicago (“City Defendants”), by their respective undersigned attorneys, oppose Plaintiff’s motion for leave to file his excessive brief and state:

On August 27, 2018, Plaintiff complained that City Defendants’ motion for leave to file oversized briefs, which Plaintiff mistakenly asserted would consist of a combined 110 pages, was “abusive.” Dkt. 704. Instead, he argued that the Seventh Circuit has “stressed repeatedly that parties must make editorial decisions in order not to burden courts with verbose briefs outlining every imaginable argument.” *Id.*, citing *Fleming v. County of Kane*, 855 F.2d 496, 497 (7th Cir. 1988) (“Page limitations are important, not merely to regulate the Court’s workload, but also to encourage litigants to hone their arguments and to eliminate excessive verbiage.”). In fact, City Defendants’ four briefs were 16, 27, 16 and 34 pages each, a total of 93 pages.

Plaintiff’s motion to file a 133 page response brief takes hypocrisy to – literally – new lengths. It should be denied, and this Court should instruct Plaintiff to edit his response responsibly so that the Court and the City Defendants are not unreasonably burdened with having to grapple with it.

Date: November 14, 2018

Respectfully Submitted,

s/ Eileen E. Rosen
EILEEN E. ROSEN
One of the Attorneys for City of Chicago

/s/ Jeffrey N. Given
JEFFREY N. GIVEN
One of the Attorneys for Individual Defendants

Eileen E. Rosen
Stacy A. Benjamin
Catherine M. Barber
Theresa B. Carney
Rock Fusco & Connelly, LLC
321 N. Clark, Suite 2200
Chicago, IL 60654
Tel:(312)494-1000
erosen@rfclaw.com

James G. Sotos
Jeffrey N. Given
Caroline P. Golden
Jeffrey R. Kivetz
Joseph M. Polick
David A. Brueggen
The Sotos Law Firm, P.C.
550 E. Devon Avenue, Suite 150
Itasca, IL 60143.
Tel: (630)735-3300
jgiven@jsotoslaw.com

/s/Thomas M. Leinenweber
THOMAS M. LEINENWEBER
One of the Attorneys for Reynaldo Guevara

Thomas E. Leinenweber
James V. Daffada
Leinenweber Baroni & Daffada, LLC
120 N. LaSalle Street, Suite 2000
Chicago, IL 60602
Tel: (312)663-3003
thomas@ilesq.com
jim@ilesq.com

CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury pursuant to 28 U.S.C.A. § 1746 that on November 14, 2018, I electronically filed the foregoing **City Defendants' Objection to Plaintiff's Motion for Leave to File Excess Pages** with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following CM/ECF participants below.

Attorneys for Plaintiff

Arthur R. Loevy
Jonathan I. Loevy
Elizabeth N. Mazur
Russel Ainsworth
Michael I. Kanovitz
Steven E. Art
Anad Swaminathan
Rachel Brady
311 N. Aberdeen
Chicago, IL 60607
(312)243-5900
(312) 243-5902 (Fax)
loevylaw@loevy.com
jon@loevy.com
Elizabethm@loevy.com
russell@loevy.com
mike@loevy.com
steve@loevy.com
annad@loevy.com
Brady@loevy.com

J. Samuel Tenebaum
Bluhm Legal Clinic
375 East Chicago Avenue
Chicago, IL 60611
(312) 503-4808
s-tenenbaum@law.northwestern.edu

Locke E. Bowman, III
Alexa Van Brunt
Roderick MacArthur Justice Center
Northwestern University School of Law
375 East Chicago Avenue
Chicago, IL 60611
(312)503-0844
(312)503-1272 (fax)
l-bowman@law.northwestern.edu
a-vanbrunt@law.northwestern.edu

Attorneys for City of Chicago

Eileen E. Rosen
Stacy A. Benjamin
Catherine M. Barber
Theresa B. Carney
Rock Fusco & Connelly, LLC
321 N. Clark Street, Suite 2200
Chicago, IL 60654
(312)494-1000
(312)494-1001(fax)
erosen@rfclaw.com
sbenjamin@rfclaw.com
cbarber@rfclaw.com
tcarney@rfclaw.com

Attorneys for Reynaldo Guevara

Thomas M. Leinenweber
James V. Daffada
Leinenweber Baroni & Daffada, LLC
120 N. LaSalle Street, Suite 2000
Chicago, IL 60602
(312)663-3003
thomas@ilesq.com
jim@ilesq.com

/s/ Jeffrey N. Given
JEFFREY N. GIVEN, Attorney No. 6184989
One of the Attorneys for Individual Defendants